

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division**

KEVIN REAGAN,)
Plaintiff,)
v.) Civil Action No. 4:23-cv-158
JOHN RATCLIFFE, Director,)
Central Intelligence Agency,)
Defendant.)

PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS
PLAINTIFF'S AMENDED COMPLAINT¹

Plaintiff Kevin Reagan, by and through undersigned counsel, hereby opposes Defendant's Motion to Dismiss Plaintiff's Amended Complaint (Dkt. 61) and requests that this Court deny Defendant's Motion in its entirety, for the reasons articulated in Plaintiff's Memorandum of Points and Authorities in Opposition to Defendant's Motion to Dismiss Plaintiff's Amended Complaint, which is attached hereto and incorporated herewith.

Dated: July 28, 2025

Respectfully submitted,

/s/ LENORE C. GARON
LENORE C. GARON
VSB # 39934
Law Office of Lenore C. Garon, PLLC
2412 Falls Place Court
Falls Church, VA 22043
Phone: 703-534-6662
Fax: 703-534-4448

¹ Per the Court's Order (Dkt. 23), Plaintiff submitted to Defendant's Prepublication Classification Review Board (PCRB) his Opposition to Defendant's Motion to Dismiss his Amended Complaint, together with a Memorandum of Points and Authorities in Opposition and a proposed Order on July 17, 2025. On July 25, 2025, the PCRB communicated that no classified information was identified and no changes are required for publication, and therefore, Complainant is filing his Opposition after gaining approval from the PCRB.

Lenore@lenorecgaron.com

Attorney for Plaintiff

/s/ DANIEL K. GEBHARDT
DANIEL K. GEBHARDT
Admitted Pro Hac Vice
(D.C. Bar No. 975703)
Solomon Law Firm, PLLC
1025 Connecticut Avenue, N.W.
Suite 1000
Washington, DC 20036
Phone: 866-833-3529
Fax: 202-688-1896
dgehardt@fedemploylaw.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Plaintiff's Opposition to Defendant's Motion to Dismiss Plaintiff's Amended Complaint, and a proposed order, were served on this 28th day of July 2025 via electronic filing using this Court's CM/ECF system, on Defendant:

Daniel P. Shean, Assistant U.S. Attorney
Virginia State Bar No. 84432
Counsel for Defendant
Office of the United States Attorney
101 West Main Street, Suite 8000
Norfolk, Virginia 23510-1671

Email: daniel.shean@usdoj.gov

/s/ Lenore C. Garon
Lenore C. Garon